

ALTS' perspective. Ameritech supports the means and variance analysis contained in AT&T's earlier ex parte submission,⁴ concerning which AT&T latest proposal is a refinement (Ameritech Comments at 95). Similarly, Ameritech also agrees with "the general framework presented by AT&T for determining disparity in the first stage of the analysis" (Ameritech Comments at 93). From ALTS' perspective, the key issue here is for the Commission to adopt a single statistical test, even if debate continues concerning which refinements may be the most desirable.

BellSouth's proposed "statistical process control" approach falls far short of AT&T, MCI, and Ameritech's proposals (Application by BellSouth for Provision of In-Region, InterLATA Service in Louisiana, Appendix A, Vol 5, Tab 13, Stacy Aff. at 12-13; CC Docket No. 97-231). Statistical process control arose out a context where the measuring entity (originally a manufacturer seeking to improve and standardized production quality) had a full economic incentive to employ the technique in a sound fashion. OSS NPRM, App. B, ¶ 7. In the present situation, where the ILECs would have an incentive to misuse the technique, SPC's lack of well-understood mechanisms to prevent such distortions would likely prove fatal. Accordingly, it should be rejected here.

⁴ Filed February 3, 1998, at 2-3.

VI. THE ILECS' CLAIM THAT THE IOWA UTILITIES ORDER SOMEHOW ARGUES AGAINST THE ISSUANCE OF MODEL RULES IS IRRELEVANT IN LIGHT OF THE UPCOMING SUPREME COURT DECISION ON THIS ISSUE.

BellSouth and other ILECs insist that the Iowa Utilities decision somehow precludes the issuance of model rules (see, e.g., BellSouth Comments at 2-6; Ameritech Comments at 6-11). Putting aside the fact that none of the ILECs' vehement protestations attempts to grapple with the fact the Eighth Circuit upheld the Commission's conclusion that OSS are in fact unbundled network elements under section 251(c)(3), there is no practical need for the Commission to address these claims at the present time.⁵ Having granted the ILECs' conditional petitions for certiorari on this issue in January of this year, the Supreme Court will resolve this matter with finality sometime within the next six months. If there proves to be any issue remaining concerning the model rules at that time, the Commission will be able to fully reflect those concerns then.

Bell Atlantic's claim that section 271 does not support the Commission's power to issue performance measurements or standards is similarly flawed (Bell Atlantic Comments at 4). The Eighth Circuit's issuance of a "writ of mandamus" on January 22, 1998, concerning the Commission's power to review state pricing

⁵ Iowa Utilities Board v. FCC, 102 F.3d 753, 808-10 (8th Cir. 1997).

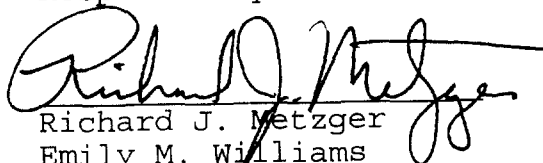
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decisions in the context of section 271 applications, is the subject of a petition for certiorari that has been lodged with the current Supreme Court proceedings, and will likely be disposed of when the Court issues its final rulings.

CONCLUSION

For the foregoing reasons, the Commission should promptly adopt the proposed Model Rules with the modifications proposed by ALTS.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Richard J. Metzger", is written over the typed name.

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ENDOFFICE NAME	CLLI CODE	TRUNKS-FOCAL	TRUNKS-AIT
ALGONQUIN	ALGNILAQDS0	48	24
ANTIOCH	ANTCILACDS0	48	0
ARLINGTON HTS DS1	ARLHILAHDS1	96	0
AURORA "AE"	AURRILAEDS0	120	48
AURORA "AR"	AURRILARDS0	96	48
AUSTIN CG0	CHCGILAU CG0	48	0
BARRINGTON	BNTOLBADS0	48	24
BARTLETT	BRTLILBTDS0	96	48
BELLWOOD CG0	BLWDILBWCG0	48	0
BEVERLY CG0	CHCGILBECG0	72	0
BLUE ISLAND	BLISILBIDS0	96	24
BOLINGBROOK	BGBKILBKDS0	24	0
CALUMET CITY DS0	CMCYILCCDS0	48	0
CALUMET CITY DS1	CMCYILCCDS1	24	0
CANAL DS3	CHCGILCLDS3	48	24
CARY	CARYILCADS0	48	0
CHICAGO HEIGHTS	CHHGILCHDS0	48	0
CICERO CG0	CICRILCICG0	48	0
CRYSTAL LAKE	CRLKILCKDS0	120	24
DEERFIELD	DRFDILDFDS0	72	24
DES PLAINES DS0	DSPLILXLDS0	24	0
DES PLAINES DS1	DSPLILXLDS1	72	24
DORCHESTER	CHCGILDODS0	72	24
DOWNERS GROVE DS0	DWGVILDGDS0	72	24
DOWNERS GROVE DS1	DWGVILDGDS1	24	0
EAST CHICAGO HTS	ECHGILEHDS0	24	0
EDGEWATER CG0	CHCGILEDCG0	144	0
ELGIN	ELGNILELDS0	120	72
ELK GROVE DS0	EGVGILEGDS0	24	0
ELK GROVE DS1	EGVGILEGDS1	96	48
ELMHURST	EMHRILETDS0	72	24
EVANSTON	EVTNILEVDS0	144	96
FOX LAKE	FXLKILFKDS0	48	0
FRANKFORT	FRFTILFBDS0	24	0
FRANKLIN DS3	CHCGILFRDS3	48	24
FRANKLIN DS4	CHCGILFRDS4	48	0
FRANKLIN DS6	CHCGILFRDS6	48	24

GENEVA	GENVILGNS0	96		24	
HARVEY	HRVYILHADS0	48		24	
HIGHLAND PARK	HGPKILHPDS0	24		0	
HINSDALE	HNDLILHIDS0	96		48	
HOFFMAN ESTATES	HFESILWLDS1	168		96	
HOMEWOOD	HMWDILHODS0	72		24	
HUMBOLDT CG0	CHCGILHBCG0	72		0	
IRVING	CHCGILIRDS0	96		72	
JOLIET DS0	JOLTILJWDS0	48		24	
JOLIET DS1	JOLTILJWDS1	48		0	
KANKAKEE	KNKKILKKDS1	96		24	
KILDARE CG0	CHCGILKICG0	24		0	
LAFAYETTE	CHCGILLADS0	48		24	
LAKE FOREST	LKFRILLFDS0	72		24	
LAKE ZURICH	LKZRILLZDS0	72		24	
LAKEVIEW CG0	CHCGILLWCG0	96		0	
LAKEVIEW DS0	CHCGILLWDS0	168		120	
LASALLE	LSLLILLSDS0	192		0	
LIBERTYVILLE	LBVLILLIDS0	240		120	
LOMBARD	LBRDILLMDS0	96		48	
MCHENRY	MCHNILMYDS0	72		24	
MERRIMAC	CHCGILMEDS0	96		48	
MONROE DS0	CHCGILMODS0	48		0	
MONROE DS1	CHCGILMODS1	48		24	
MORTON GROVE	MRGVILMGDS0	72		24	
NAPERVILLE	NPVLILNADS0	168		72	
NEW LENOX	NWLNILNLDS0	24		0	
NEWCASTLE	CHCGILNEDS0	96		48	
NORTH CHICAGO	NCHCILNCDS0	24		0	
NORTHBROOK	NBRKILNBDS0	96		48	
OAK LAWN	OKLWIOLDS0	144		48	
OAK PARK CG0	OKPKILOPCG1	72		0	
OAKLAND CG0	CHCGILOKCG0	48		0	
ORLAND PARK	ORPKILORDS0	96		24	
OTTOWA	OTWAILOTDS0	144		48	
PALOS PARK	PLPKILPPDS0	48		0	
PARK FOREST	PKFSILPFDS0	72		24	
PARK RIDGE DS0	PRRGILXLDS0	24		0	


PLAINFIELD	PLFDILPLDS0	48		24	
PROSPECT CG0	CHCGILPRCG0	72		0	
PULLMAN CG0	CHCGILPUCG0	72		0	
RIVERDALE	RVDLILRDDS0	48		0	
ROGERS PARK CG0	CHCGILRPCG0	96		0	
ROSELLE	RSLILRZDS0	120		96	
ROUND LAKE	RNLKILRLDS0	48		0	
SCHAUMBURG	SCBGILCODS0	24		0	
SKOKIE	SKOKILSKDS0	144		96	
SOUTH CHICAGO CG0	CHCGILSCCG0	96		0	
STEWART CG0	CHCGILSTCG0	72		0	
STEWART DS0	CHCGILSTDS0	24		0	
SUPERIOR DS0	CHCGILSUDS0	48		24	
SUPERIOR DS2	CHCGILSUDS2	72		48	
TINLEY PARK	TNPKILTPDS0	120		72	
WABASH DS0	CHCGILWBDS0	24		0	
WAUCONDA	WCNDILWUDS0	24		0	
WAUKEGAN	WKGNILWKDS0	120		48	
WEST CHICAGO	WCHCILWCDS0	24		0	
WHEATON	WHTNILWHDS0	120		96	
WILMETTE	WLMTILWIDS0	48		0	
WOODSTOCK	WDSTILWSDS0	96		0	
ZION	ZIONILZND0	24		0	
ARLINGTON HTS DS0	ARLHAHDS0	24		24	
BENSENVILLE	BNSVILBVDS0	24		24	
DEARBORN	CHCGILIDDS0	72		72	
EAST DUNDEE	EDNDILDUDS0	48		48	
FRANKLIN DS0	CHCGILFRDS0	72		72	
GLEN ELLYN	GLELILGEDS0	24		24	
GLEN VIEW	GLVILGVDS0	48		48	
GRAYS LAKE	GLYLKILGLDS0	48		48	
HICKORY HILLS	HCHLILHDS0	48		48	
LAGRANGE	LGRGILLGDS0	48		48	
LAKE VILLA	LKVLILLKDS0	24		24	
LEMONT	LEMTILLNDS0	24		24	
PALATINE	PALTILPADS0	120		120	
PARK RIDGE DS1	PRRGILXLDS1	24		24	
PORTSMOUTH	CHCGILPMD0	48		48	

SUMMIT	SMMTILSMDS0	24		24	
SUPERIOR DS1	CHCGILSUDS1	48		48	
WABASH DS3	CHCGILWBDS3	48		48	
WHEELING	WLNGLWGDSD0	120		120	
WINNETKA	WNTKILWNDS0	24		24	
Total End Office		8208		3240	
LAGRANGE	TANDEM	360		240	
NEWCASTLE	TANDEM	360		240	
WABASH	TANDEM	1128		888	
NORTHBROOK	TANDEM	360		240	
STEWART	TANDEM	96		0	
Total Tandem		2304		1608	
Percentage Total Trunks Carried by Focal **		68.4%			
Percentage of End Office Trunks/Total Trunks		74.5%			

** This percentage expected to increase to approximately 73% by September 1st based upon orders already issued and lack of Ameritech fiber optic facilities.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 1998, copies of the foregoing Reply Comments of the Association for Local Telecommunications Services were served via first class mail, postage prepaid, or by hand as indicated to the parties listed below.


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